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**JUDGMENTS—EFFECT OF REVERSAL, ON ACTS IN PURSUANCE OF.**—Acts done pursuant to a subsisting judgment which is afterwards reversed are held, in *Bridges v. McAllister* (Ky.), 45 L. R. A. 800, to constitute no basis for an action of tort. The case was one of damages by filling up a ditch in pursuance of a judgment which was afterwards reversed. In connection with this case is a note presenting the other authorities on the question of liability for tort in doing acts authorized by a subsisting judgment which is afterwards reversed.

**FRAUD—CONCEALMENT OF FACTS WITHIN KNOWLEDGE OF VENDEE.**—While the mere expression of an opinion as to value, or the failure to disclose to the seller facts unknown to him which materially increase the value of the property purchased, is deemed insufficient to constitute actionable fraud, it is held, in *Stackpole v. Hancock* (Fla.), 45 L. R. A. 814, in the case of the purchase of a mine, that if the purchaser undertakes to disclose facts in his knowledge, or answer inquiries as to them, he must disclose the whole truth, without doing anything calculated to prevent an investigation on the part of the vendor—especially if the latter does not reside near the land, while the vendee does.

**COPYRIGHT—INFRINGEMENT—DAMAGES.**—The contention that damages for infringement of copyright in violation of U. S. Rev. Stat., sec. 4966, constitute a penalty or a forfeiture within the exclusive jurisdiction of a district court of the United States is denied by the Supreme Court of the United States in *Brady v. Daly* (Advance Sheets U. S. 62), although in *Wheeler v. Cobbey*, 70 Fed. Rep. 487, the circuit court had held the obligation to pay damages for violating section 4964 to be a penalty, and therefore subject to the two years' limitation of section 4968.

**TRUSTS—FEDERAL ANTI-TRUST ACT.**—By a sweeping and far-reaching decision the United States Supreme Court, in the case of *Addyston Pipe & Steel Co. v. United States* (Advance Sheets U. S. 96), holds that the power of Congress to regulate commerce includes the power to legislate upon the subject of private contracts in respect to commerce, and that the exercise of this power does not violate the constitutional guaranty of the liberty of the individual to make contracts. The case in hand was a combination between corporations engaged in the manufacture, sale and transportation of iron pipe, by which the companies, when making public bids for contracts, worked under an arrangement which eliminated all competition. This is held to violate the anti-trust law so far as it applies to sales for delivery beyond the State in which the sale is made, but bids of members who reside and carry on business in the State where the sale is made are held to be beyond the reach of the law.

**CONSTITUTIONAL LAW—EQUAL PROTECTION OF THE LAWS—ACTS CONSTITUTIONAL IN PART.**—In *Tullis v. Lake Erie etc. R. Co.*, 20 Sup. Ct. 136, it is held that a State statute making railroad companies liable to employees for injuries due to the negligence of fellow-servants is not unconstitutional, as depriving such companies of the equal protection of the laws, though applicable to railroad companies only; since there are peculiar hazards in the operation of railroads.

The statute in question was in terms applicable to all corporations not municipal, and did not apply to non-corporate employers. The railroad company assailed